

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America
v.

LOUIS BONNER JR.

Case No. 3:24-mj-379

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/10/2024 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section
18 USC s. 922(g)(1) & 924(a)(8)

Offense Description
felon in possession of a firearm that moved in interstate commerce

This criminal complaint is based on these facts:

See Attached Affidavit of Jason Rhodes

☒ Continued on the attached sheet.

Jason Rhodes
Complainant's signature

Jason Rhodes, TFO of the FBI
Printed name and title

Sworn to by reliable electronic means -- namely, telephone.

Date: June 28, 2024

City and state: Dayton, Ohio

Caroline H. Gentry
Caroline H. Gentry
United States Magistrate Judge



AFFIDAVIT

I, Jason E. Rhodes, am currently a Task Force Officer (“TFO”) assigned to both the Federal Bureau of Investigation’s (“FBI”) Safe Streets Task Force (“SSTF”) and the Dayton Police Department’s (“DPD”) Major Case Unit in the Special Investigations Bureau. After being duly sworn, I depose as follows:

INTRODUCTION

1. I have been employed as a law enforcement officer with the DPD since November 2007. Based upon my SSTF TFO status, I have been sworn under Title 21, United States Code (“U.S.C.”), Section 878 to serve as an officer of the United States duly empowered to conduct federal criminal investigations and execute arrests for criminal violations pursuant to Titles 18 and 21 of the U.S.C.
2. As a TFO with both the DPD’s Major Case Unit within the Special Investigations Bureau and the FBI’s SSTF, I have concentrated on the investigation of narcotics, firearms, and gang related criminal cases. During my law enforcement career, I have been involved in dozens of drug-related arrests, search warrants resulting in the seizure of large quantities of narcotics and firearms, participated in undercover narcotics purchases, and supervised the activities of police informants who have provided law enforcement authorities valuable and accurate information and assistance that resulted in undercover narcotics purchases and apprehensions. During my law enforcement career, I have received an extensive amount of formal and informal training in the investigation of drug trafficking and narcotics related crimes. Based on my extensive experience, training, education and knowledge in the investigation of narcotics related cases, I have come to recognize the inextricable link between drug trafficking activities, firearms, and the potential for violence.
3. This affidavit is submitted in support of a criminal complaint which seeks the issuance of a federal arrest warrant against **LOUIS BONNER JR.** (hereinafter referred to “**BONNER**”) for the following suspected offenses:
 - A. Being a Felon in Possession of a Firearm and Ammunition, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

The facts contained in this affidavit are submitted for the express purpose of establishing probable cause to obtain an arrest warrant for **BONNER**. This affidavit does not include every fact presently known to law enforcement authorities who participated in subject investigation.

FACTS

4. In December 2023, I began a drug investigation into **BONNER** at 29 North Upland Avenue in Dayton, Ohio. I authored a search warrant for him at that location, and the search warrant was signed by Dayton Municipal Court Judge Christopher Roberts on January 9, 2024, at 0847 hours. The search warrant was served on January 10, 2024, at 1025 hours.

5. We knocked and announced on the front entrance door but were met with no response, and after a reasonable amount of time, Detective John Howard used a ram to force open the front entrance door. The house was secured, and we did not find anyone inside. **BONNER** was on house arrest due to a pending criminal case, and the GPS location of his monitor was outside of Columbus, Ohio, presumably working on a jobsite. His registered address for the house arrest was 29 North Upland Avenue, and, based on location information, he was at the house the entire day prior.
6. The house had three bedrooms, two downstairs and one upstairs. Both downstairs bedrooms appeared to be set up for children, with only the upstairs bedroom set up for an adult. **BONNER** was the only adult I knew to be living in the house at the time. \$675.00 US currency, 215 grams of marijuana, and a loaded handgun were located in the upstairs bedroom. The handgun was a Taurus Judge that had an obliterated serial number. It was loaded with five live .45 Colt rounds and was found between the mattress and the box springs. I test fired the handgun on January 11, 2024, and found it to be operable. I also know from speaking with ATF Agent Christopher Reed that the handgun was not manufactured in the state of Ohio. We also located mail addressed to **BONNER** at that address in the same bedroom. All of the clothing and shoes in the bedroom appeared to belong to an adult male. There were two additional handguns located in the attic crawlspace directly accessible from the upstairs bedroom, both of which appeared to have been there for an extended period of time.
7. Your Affiant has performed a criminal records review of **BONNER's** criminal history. This search has confirmed that **BONNER** has previously been convicted of the following felony crimes, which carry a maximum statutory penalty in excess of imprisonment one year, to wit:
 - a. On or about March 16, 2004, in the Montgomery County Court of Common Pleas, in Case Number 2003-CR-01947, for Possession of Cocaine, in violation of the Ohio Revised Code.
 - b. On or about June 28, 2019, in the United States District Court, Southern District of Ohio, Western Division, in Case Number 3:19-CR-81, for maintaining any place for the purpose of distributing any controlled substance, in violation of United States Code.
8. Bonner knew that he had been convicted of a crime punishable by a term of imprisonment exceeding one year. Specifically, through his plea agreement and plea colloquy for his federal maintaining a premises conviction, **BONNER** acknowledged that he understood that this charge carried up to 20 years of imprisonment upon conviction.
9. Based on the above information, I believe that probable cause exists to conclude that on January 10, 2024, while in the Southern District of Ohio, **BONNER** was in Possession of a Firearm and Ammunition after having been convicted of felony crimes punishable by more than one year in prison, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(8).

10. As such, I respectfully request that an arrest warrant be issued against **BONNER** for the aforesaid criminal violations.

Jason Rhodes

Jason E. Rhodes, Task Force Officer
FBI-CID Task Force
DPD-Major Case Unit

Sworn and subscribed before me via telephone on this 28th day of June 2024.

Caroline H. Gentry
Caroline H. Gentry
United States Magistrate Judge

The seal of the United States District Court for the Southern District of Ohio is circular. It features an eagle with spread wings in the center, perched on a shield with vertical stripes. Above the eagle's head is a constellation of stars. The words "UNITED STATES DISTRICT COURT" are written in a circle around the top, and "SOUTHERN DISTRICT OF OHIO" is written around the bottom.